

# **Discharges from Utility Vaults and Underground Structures to Surface Waters**

General NPDES Permit Renewal

# Background

- Original permit adopted in 1996
- Renewed in 2001- Order No. 2001-11-DWQ
- SIP was adopted in 2001
- The permit covers rain and groundwater that is pumped, intermittently from vaults and underground structures (manholes)
- Order No. 2001-11-DWQ granted exception to the SIP because:
- Discharge is not permitted if there is reasonable potential to cause or contribute to a water quality violation

# Receiving Water

- Water can be discharged to a storm sewer or water body
- Discharges to sanitary sewers are exempt
- The discharger must submit 5 representative monitoring samples and name the discharge point for each
- Detailed inspections of both the vault/structure and discharge point are required upon discharge

# Key Changes

- Monitoring is required in each region
- There is a list of Pollution Prevention Practices to be included in the PLAN (e.g. Good Housekeeping and Spill Prevention)
- PLANs now require public notification and adoption
- Inspections are now required

# Comments and Responses

- The frequency of inspections is burdensome
- Agree. Inspections were not required at all prior to this renewal. Detailed inspections must be done at each vault prior to discharge.
- The PLANs should be adopted at the State Water Board, not at each Regional Board
- Discharges would lose the right to petition

# Comments and Responses

- The effective date should be pushed back because more time is needed to submit the PLANS
- Dischargers have known about the change since May 2006. Public Hearing was pushed back- change effective date to Dec. 1, 2006
- Re-enrollees should not have to submit an application
- Federal regulation requires that dischargers reapply

# Comments and Responses

- Some of the requirements in the PPP section of the permit do not apply
- Indicate “Not Applicable” in the PLAN
- Use job titles instead of names in the PLAN
- Because of staff turnover and promotion, etc., use job title in lieu of staff name
- The terms “site” & “facility” used interchangeably are confusing
- Use “site” for vault/structure(s) & “discharger” for utility

# Comments and Responses

- pH readings should be done onsite
- Field-testing is preferable. Refer to 40 CFR Part 136 for analytical methods. Labs conducting sample analyses must be certified
- The record retention period is burdensome
- Standard practice & previous UV permits require records be kept for the life of the permit (5 years)

# Comments and Responses

- Add provision that identifies contractors as responsible for fines associated with noncompliance
- More appropriate for the contract between the utility company and its contractor
- Map should identify nearest drainage feature (i.e. storm drain), not all surface waters within the boundaries of the service area
- For each representative sample, dischargers should provide a map of the discharge point – either a storm drain or receiving water

# Staff Recommendation

- Adopt the permit with the changes listed on the errata sheet